

JOHN ASHCROFT
Governor



RON KUCERA
Acting Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102

December 7, 1992

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RCOM SECTION

Ms. Dianne Huffman
U.S. EPA Region VII
RCRA Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Ms. Huffman:

The Missouri Department of Natural Resources (MDNR) has completed a review of the draft report entitled "Environmental Priorities Initiative Preliminary Assessment-Silvanus Products, Inc." dated October of 1992. In general, the MDNR finds the draft report to be accurate and well written. The following draft comments, however, are provided for your concurrence or additional input.

COMMENTS:

1. Page ES-1, paragraph 4 discusses the "...RCRA-permitted hazardous waste storage area." Since this area was not permitted, please change to state that the area was an "interim status hazardous waste storage area." Also in the same paragraph, it states "Missouri Department of Natural Resources (MDNR) assigned Georgia-Pacific's Missouri generator ID number to Silvanus, pending approved closure of the permitted area." Please delete this sentence because the area was never a "permitted area." In addition, the MDNR assigned Georgia-Pacific a generator number, but it is not "pending" on the closure of the unit.
2. It should be mentioned that paper products were printed and silk screened in the executive summary as well as the main body of the report. Sections of the report where this should be mentioned include page ES-1, paragraph 3; page 2, section 2.3, paragraph 1; and page 3, section 2.4, paragraph 1.
3. A series of figures showing the history of building configurations and building entrance and exit points would be beneficial in identifying past waste management areas. If possible, please include in the final report.



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4. Page ES-1, paragraph 5 states that four groundwater wells are located "...within one-quarter mile south of the site and downgradient." It is not clear whether the word downgradient refers to the fact that the wells are located downstream in relation to the Mississippi River, or whether it refers to downgradient in the sense that they are located hydrogeologically downgradient. If they are located hydrogeologically downgradient from the Silvanus site, what information is this based on? Please clarify.
5. Page 2, section 2.2, paragraph 1 discusses the dimensions of the Silvanus site. The report states that the site measures "...264 feet, east to west, at the north end..." According to figure 3 in the appendix of the report, the east to west dimension is approximately 264 feet at the widest point, not the northernmost limit of the site. Please clarify the discrepancy.
6. Page 6, section 3.1, paragraph 2 discusses the MDNR's computerized database. Please mention that this database is administered by MDNR's Division of Geology and Land Survey (DGLS). In addition, it would be beneficial to note that the indicated water wells were completed in alluvial materials.
7. Page 7, section 3.3, description of the Karst Plain contains a typographic error in the third sentence.
8. Page 7, section 3.1, paragraph 3 discusses wastewater issues. According to our records, the city lagoons were destroyed by a flood in 1986 and are no longer in existence. The oxidation ditch is located closer to town. Please clarify.
9. Page 10, section 4.1, Urban Klein's name is spelled wrong.
10. Summary of Recommendations for Area of Concern (AOC) A should be changed. Since this is an area of accidental discharge (i.e., is not an area of deliberate and systematic release), and since the apparent constituent of concern is not listed in 40 CFR Part 261 Appendix VIII as a hazardous constituent (i.e, hydraulic oil), sampling of the area should not be recommended as part of the RFA. It should be recommended, however, that Silvanus correct the situation by eliminating the discharge. Silvanus should then provide documentation to the MDNR/EPA which shows that they have eliminated the discharge. If they fail to correct the situation within a reasonable timeframe, the MDNR/EPA may initiate elevated enforcement action.
11. It appears that another solid waste management unit (SWMU) exists at the site that was not discussed in the report. The dumpster at the

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rear of the building near the loading dock may need to be classified as a SWMU. The MDNR would like to discuss this possibility with EPA.

The MDNR would appreciate your comments and/or concurrence on the following comments within 21 days of receipt of this letter. If comments are not received by the MDNR within that time, we will assume EPA's concurrence, and transmit our final comments to Metcalf and Eddy for their incorporation into the final RFA report. If there are any questions or comments, please contact me at (314) 751-7266.

Sincerely,



Gene A. Williams
Environmental Engineer

GAW:ji

cc: Lynn Harrington, U.S. EPA